

## **REMARKS**

Claims 1-30 are pending in the application. Claims 1-30 stand rejected.

Applicant respectfully requests reconsideration in view of the foregoing amendments and the remarks hereinbelow.

### **Rejection of Claims under 35 U.S.C. 103:**

#### **I. Claims 1-15:**

Claims 1-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tomat et al. (U.S. 6,784,925) and Schmitt (U.S. 5,983,220). Tomat describes generally a system for managing files stored on a digital camera. This system of Tomat et al. includes a user interface for a window wing application for viewing system objects which includes a first area for displaying a hierarchical tree of system objects and a second area for displaying a thumbnail image corresponding to a system objects selected in the first area. A third area is adjacent to the second area for displaying a second icon indicating that a sound file is associated with the displayed thumbnail image. A fourth area which surrounds the second area and third area may be selected in drag to an icon representing a storage device in order to copy the displayed thumbnail image, full-resolution image file associated with the the displayed thumbnail image, and any associated sound files to the storage device. The icon of Tomat et al. comprises an area icon that contains a number of thumbnail images representing individual full-resolution images that happen to be located in the hierarchical tree. However, the icon of Tomat et al. is not provided in the manner of a scatter plot, and is not plotted according to the first dimension, and second dimension on the scatter plot. Further, the distinct visual characteristics of the icon of Tomat et al. is not evidenced by distinct visual characteristics of the icon instead, the eye, near nearly present merely contains a group of thumbnail images.

To the extent that it could be argued that each individual numbered area containing a thumbnail image of to the extent that Philmont et al. shows, in certain illustrations thumbnail image areas 192 containing a thumbnail image icons and date information constitutes a tape picture icon, it will be appreciated that such a construction of, still is not read upon the invention has claimed in that each area 192 represents one and only one image, and is plotted in a sequential manner without any organization with reference to a first display dimension or second display dimension. Further, each area 192 of Tomat does not indicate a

group of pictures determined according to the first, second, and third display dimensions. In accordingly, the plain language of, Philmont and any other alternative construction of, fail to teachers suggest limitations of claim 1.

Further, Schmitt, U.S. Pat. No. 5,983,220 shows a conventional database system to generate scatter plots cf. Figs. 23 and 24. However, in Schmitt each point on each scatter plot represents only one item. Schmitt does not therefore determining groups of pictures according to the first, second and third characteristics, and does not provide in the manner of a scatter plot, a plurality of picture icons plotted according to a first dimension along a first axis corresponding to said first display dimension, and a second dimension along a second axis corresponding to said second display dimension, with each picture icon indicating a determined group of pictures.

## II. Claims 16 – 24:

Claim 16. A graphical user interface adapted to navigate and retrieve pictures in a picture database, said graphical user interface (GUI) comprising:

a first display dimension generator adapted to generate a first display dimension representing a first characteristic of the pictures;

a second display dimension generator adapted to generate a second display dimension representing a second characteristic of the pictures;

a third display dimension generator adapted to generate a third display dimension representing a third characteristic of the pictures; and

an icon generator adapted to determine groups of pictures according to the first, second and third dimensions, and to generate in the manner of a scatter plot, a plurality of picture icons plotted according to a first dimension along a first axis corresponding to said first display dimension, and a second dimension along a second axis corresponding said second display dimension, each picture icon indicating a determined group of pictures ~~set of pictures in the picture database grouped using the first, second, and third dimensions;~~

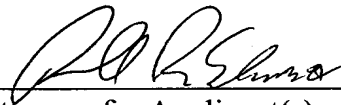
wherein said third dimension is evidenced by distinct visual characteristics of said icons.

For the reasons discussed above it will be appreciated that neither Tomat et al. nor Schmitt disclose an icon generator that is adapted to determine groups of pictures according to the first, second and third dimensions and, further, neither discloses an icon generator that is adapted to generate in the manner of a scatter

plot, a plurality of picture icons plotted according to a first dimension along a first axis corresponding to said first display dimension, and a second dimension along a second axis corresponding said second display dimension, each picture icon indicating a determined group of pictures.

Accordingly, it is respectfully submitted that claim 16 and all claims that depend therefrom are in a condition for allowance. It is respectfully submitted, therefore, that in view of the above amendments and remarks, that this application is now in condition for allowance, prompt notice of which is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'RR Schindler II', is written over a horizontal line.

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